

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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**ANTHONY MAGLIETTA, STEVEN  
REID, AND JERRY VICTORIOUS,**

Plaintiffs,

v.

**AMERICA PAC; GROUP AMERICA,  
LLC; ELON MUSK**

Defendants.

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No. 5:25-cv-02364-WB

**JOINT SCHEDULING PROPOSAL**

Pursuant to the Court's directive during the initial conference of June 3, 2025, the parties have conferred and submit the following proposal for the schedule in this case:

- Initial disclosures under Fed. R. Civ. P. 26(a)(1) to be exchanged on or before June 24, 2025.
- Stipulated protective order to be submitted on or before July 10, 2025.
- Plaintiffs' motion for class certification to be filed on or before October 10, 2025.
- Discovery ends 60 days after either (1) the conclusion of the class opt-out period (if a class is certified); or (2) denial of class certification.
- Expert witness designations to be disclosed 60 days after the overall discovery end date; initial expert reports due 45 days the overall discovery end date; rebuttal expert reports due 30 days before overall discovery end date.
- Dispositive motions to be filed on or before January 16, 2026.
- Trial to take place in May 2026.

As the Court indicated during the initial conference, discovery in this matter will not be bifurcated.

Date: June 10, 2025

Respectfully submitted,

s/ Shannon Liss-Riordan

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document was served by electronic filing on June 10, 2025, on all counsel of record.

/s/ Shannon Liss-Riordan  
Shannon Liss-Riordan